

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO. 04-11730 NG

\_\_\_\_\_  
GEORTO, INC.,

Plaintiff,

v.

WILLIAM GATEMAN, INDIVIDUALLY  
and as TRUSTEE OF 200 UNION  
STREET REALTY TRUST

Defendant,

Third Party Plaintiff, and  
Third Party Defendant-in-  
Counterclaim

ROBERTS CORPORATION

Third Party Defendant,  
and Third Party Plaintiff-in-  
Counterclaim  
\_\_\_\_\_

**STIPULATION OF THE PARTIES TO  
EXPAND THE DISCOVERY DEADLINE**

Now come the Parties and hereby Stipulate to the following Expansion of the Discovery Schedule (and related schedule dates for Designation of Experts and Designation of Rebuttal Experts) for the limited purpose of taking the following Depositions: Goldman Environmental Consultants 30(b)(6); Lauren M. Maigret; P.M. Construction 30(b)(6); Richard Pearl; Steven McIntyre; S.W. Cole Engineering 30(b)(6); Chad B. Michaud; Thomas Mattuchio Construction, Inc. 30 (b) (6); Jackson D. Gateman (previously noticed and subpoenaed by Georto for September 26, 2005); Family Dollar Stores of Massachusetts, Inc. pursuant to Rule 30(b)(6)

(previously noticed and subpoenaed by Georto for September 28, 2005); Loveland Trucking Co., Inc. pursuant to Rule 30(b)(6) (previously noticed by Georto for September 29, 2005); the continued limited deposition of William Gateman (commenced on August 30, 2005) and Paul Yasi, Esq. (The Defendant does not intend by this Agreement to waive any privilege issues as to any Deposition of Attorney Yasi.)

The above Depositions will be completed by November 30, 2005.

The Designation of Experts/Disclosures deadline is set to December 30, 2005.

The Designation of Rebuttal Experts/Disclosures deadline is set to January 30, 2006.

The Dispositive Motion deadline is kept at January 30, 2006.

Final Pre-Trial Conference is kept as April 18, 2006.

The Trial date is kept as April 24, 2006.

This Stipulation is a resolution of the Defendant's Motion to Expand which was Opposed in part as discussed at the Status Conference held on October 17, 2005 before the Court.

WHEREFORE, the Parties petition this Honorable Court to extend the Discovery Deadlines as set forth above.

Respectfully submitted  
By the Defendant,  
William Gateman  
By his attorney

/s/

---

James S. Robbins  
6 Beacon Street  
Boston, MA 02108  
(617-227-7541)  
BBO# 421880

Agreed to by:

/s/

Dale Kerester, Esq., BBO # 548385  
Lynch, Brewer, Hoffman & Fink LLP  
101 Federal Street  
22<sup>nd</sup> Floor  
Boston, MA 02110  
617-951-0800  
dkerester@lynchbrewer.com

Agreed to by:

/s/

J. Mark Dickison, Esq.  
LAWSON & WEITZEN, LLP  
88 Black Falcon Avenue, Suite 345  
Boston, MA 02110

Date: October 24, 2005